

INTERROGATORY (C): State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Experian is not a publicly owned company. The ultimate parent company of Experian is Experian plc, which owns 100 percent of Experian. Experian plc is registered as a public company in Jersey, Channel Islands, and is publicly traded on the London Stock Exchange. The following companies are the U.S.-based subsidiaries of Experian plc that are not wholly owned: Central Source LLC, Online Data Exchange LLC, New Management Services LLC, VantageScore Solutions LLC, and Opt-Out Services LLC.

INTERROGATORY (D): State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Experian does not challenge the appropriateness of the division.

INTERROGATORY (E): Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) the explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Experian is unaware of any related matter filed in this District.

INTERROGATORY (F): If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Experian Information Solutions, Inc. is properly identified.

INTERROGATORY (G): If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: While Experian does not make such a contention at this time, it reserves the right to supplement its response after conducting discovery.

Respectfully submitted this 23rd day of March 2018.

/s/ Lyndey Ritz Zwingelberg
Lyndey Ritz Zwingelberg
(Fed ID No. 11506)
ADAMS AND REESE LLP
1501 Main Street, Fifth Floor
Columbia, South Carolina 29201
Telephone: 803-254-4190
lyndey.zwing@arlaw.com

Autumn Hamit Patterson
(*pro hac admission pending*)
Texas Bar No. 24092947
JONES DAY
2727 North Harwood St., Suite 600
Dallas, TX 75201
Telephone: (214) 969-2966

*Counsel for Defendant
Experian Information Solutions, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of March, 2018, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel of record. In addition, a copy of the foregoing was sent via mail and email to pro se Plaintiff at the physical address and email address listed below.

Earl Gavin
300 Marion Ave
Gaffney, SC 29341
Egav1986@gmail.com

/s/ Lyndey Ritz Zwingelberg
Lyndey Ritz Zwingelberg

*Counsel for Defendant Experian Information
Solutions, Inc.*